



May 9, 2019

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Rural Digital Opportunities Fund, WC Docket No. 19-126; Modernizing the Form 477 Data Program, WC Docket No. 11-10**

Dear Chairman Pai:

ACA Connects – America’s Communications Association, NTCA – The Rural Broadband Association, and the National Rural Electric Cooperative Association applaud your April 15<sup>th</sup> announcement of your intent to create the Rural Digital Opportunities Fund (RDOF), which is the logical and much needed follow-up to the current Connect America Fund (CAF) Phase II programs. By moving to ensure that rural areas in price cap carrier territories have broadband service that is comparable to the increasing performance provided in urban areas, you will further ensure that rural residents, businesses, and community anchor institutions have the connectivity to fully participate in our 21<sup>st</sup> Century economy and society. In a recent news story, a Federal Communications Commission (Commission) spokesperson was quoted as saying that the Commission will start this year to launch the RDOF and hold the auction in 2020. We support such prompt action, which would best serve the interests of rural consumers and the overall public interest.

As you noted earlier in the year, the Commission’s universal service programs have successfully reduced the number of unserved locations by many millions. Now is the time to build on that accomplishment. With the price cap CAF Phase II cost-model program ending in about two years, the Commission should seize this great opportunity and proceed promptly to award the next phase of support and drive the availability of even higher performance broadband services throughout rural America.

Indeed, the Commission can move expeditiously with the RDOF precisely because of the extensive work that went into the CAF Phase II auction. First, by using the latest Form 477 data in conjunction with a robust challenge process, the Commission can more accurately identify unserved census blocks and target support to where it is needed. We recognize that there are numerous proposals for collecting more granular broadband deployment, but no solution is going to be implemented for some time – certainly not for the next year when it would be time to move forward with the RDOF. Moreover, even with the granular collection proposals on the table, it will be difficult to ensure the data accurately reflect served and unserved locations, especially for providers using network technologies where coverage and performance can be highly variable.

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Thus, even in the long run, a challenge process appears necessary to ensuring deployment data are accurate.

Further, the rules used for the CAF Phase II program provide a sound foundation upon which to develop the rules for the RDOF. No doubt certain parameters of the new program will require updating and revision based upon lessons learned from the CAF Phase II program and auction. But, because a proven framework exists, we can build on that to quickly analyze shortcomings and make targeted refinements.

You have made it a priority to close the digital divide, and the RDOF will help make that happen. We urge you to issue a notice of proposed rulemaking as soon as possible to develop rules for the new program and then complete action by later this year. By holding the auction in 2020, you will provide unserved consumers in price cap carrier territories with the connectivity that is essential to their future.

/s/

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